

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
ROBERT P. GOODRICH,)	
)	
Petitioner,)	
)	
v.)	Civil Action No. 03-12541-NG
)	
TIM HALL,)	
)	
Respondent.)	
_____)	

**ASSENTED-TO MOTION FOR LEAVE TO IMPOUND
PETITIONER'S MEMORANDUM IN SUPPORT OF
ISSUANCE OF WRIT OF HABEAS CORPUS**

Petitioner, Robert P. Goodrich, through counsel, hereby respectfully moves, pursuant to Local Rule 7.2, that the Court impound Petitioner's Memorandum in Support of Issuance of Writ of Habeas Corpus. In support of his motion, Petitioner states as follows:

1. On April 6, 2004, this Court granted Respondent's Assented-To Motion to Impound Supplemental Answer.
2. Respondent's Assented-To Motion to Impound Supplemental Answer was based on the fact that Petitioner's brief and appendix filed in the Massachusetts Appeals Court, in connection with Commonwealth v. Robert P. Goodrich, Middlesex County Superior Court Criminal Action No. 2000-00018, included impounded grand jury testimony.
3. On May 1, 2004, this Court subsequently granted Petitioner's Assented-To Motion to Impound Opposition to Respondent's Motion to Dismiss in this action, which referenced the above-mentioned impounded grand jury testimony.

4. Petitioner's Memorandum in Support of Issuance of Writ of Habeas Corpus references the above-referenced grand jury testimony.
5. Respondent's counsel assents to the filing of this motion.
6. Pursuant to Local Rule 7.2(a), Petitioner represents that the impoundment order may be lifted upon the Court's disposition of the subject habeas petition, and all impounded materials may be returned to the Petitioner.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests that this Court impound Petitioner's Memorandum in Support of Issuance of Writ of Habeas Corpus, which will be filed on or before July 19, 2004, in accordance with the parties Joint Briefing Schedule.

Respectfully submitted,

ROBERT P. GOODRICH,
By his attorneys,

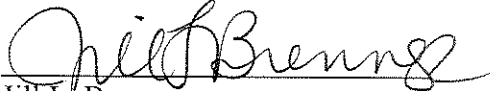


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Dated: July 12, 2004

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on July 12, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.


Jill L. Brenner